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February 19, 2025

**John M. Conlon**

VIA ECF

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Honorable Colleen McMahon  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: *Blockstream Corporation et al., v. Innosilicon  
Technology Ltd.*, 25-cv-902, Dkt. No. 7: Order  
Scheduling an Initial Pretrial Conference

Dear Judge McMahon:

We write on behalf of Petitioners Blockstream Corporation, Thigmotropism LLC, and Adam Back in the above-captioned case. Petitioners respectfully request that the Court adjourn both the Initial Pretrial Conference currently set for April 10, 2025 at 10:45AM, and the parties' March 5, 2025 deadline to complete the Civil Case Management Plan. *See* Dkt. 7. This is Petitioners' first request for adjournment.

Petitioners do not expect to serve Respondent Innosilicon Ltd. in advance of March 5, 2025 or April 10, 2025. Respondent is located in Wuhan, China, and Petitioners will need additional time to complete the international service of process requirements. Petitioners are taking all steps to complete service as promptly as possible, but it remains unlikely that Respondents will be served for several months.

Nevertheless, Petitioners do not believe that the delay in submitting a Civil Case Management Plan will cause undue delay in the adjudication of this case. Petitioners filed this action to seek Confirmation of a Foreign Arbitral Award issued by the Hong Kong International Arbitration Centre. As such, Petitioners do not expect that this action will involve any fact or expert discovery, and no trial should be necessary.

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Accordingly, we respectfully request that the March 5, 2025 submission deadline and the April 10, 2025 conference be adjourned until Petitioners have served Respondent.

Sincerely,

/s/John M. Conlon  
John M. Conlon